

March 23, 2018

VIA ECF

The Honorable Cathy Seibel
United States District Judge
U.S. District Court for the Southern District of New York
Federal Building and United States Courthouse
300 Quarropas Street
White Plains, NY 10601-4150

Re: *The Wave Studio, LLC v. General Hotel Management Ltd. et al.*
Civ. A. No. 7:13-cv-09239-CS-PED

Dear Judge Seibel:

We represent Defendants Signature Travel Network (“Signature Travel Network”), Frosch International Travel, Inc. (“Frosch”), and Vacations by Tzell dba Vacationsbytzell.com (“Tzell”) in the above-identified action and consolidated actions.

We write in response to the Court’s March 12, 2018 Order (Dkt. 238) requesting that the parties advise the Court “what they think should happen to the defendants in 13-cv-9239 other than GHM and to the cases related to 13-cv-9239.” Defendants Signature Travel Network, Frosch and Tzell agree with the proposal submitted to the Court today by Defendant American Airlines (Dkt. 241) that the most practical solution is to dismiss Plaintiff’s claims against defendants (other than GHM). We also join in American Airlines’ request that Plaintiff’s claims be dismissed **with prejudice** against defendants (other than GHM) should Plaintiff fail to initiate action against GHM in a Singaporean court “by a date certain, such as within 90 days of the date of any dismissal order in this action.”

In the event that the Court is not inclined to dismiss Plaintiff’s claims against the defendants (other than GHM), we respectfully request that the stay in this action remain in effect pending final resolution of any such Singapore proceeding, including all appeals therefrom.

We thank Your Honor for your attention to this matter.

Respectfully submitted,



Kenneth S. Weitzman

cc: All counsel of record (via ECF)